November 15, 1983

ARCO Metals Company

Environmental Newsletter

Environmental Affairs

EPA Hazardous Waste Survey
An EPA survey shows that 15% of generators have illegally disposed of hazardous waste. The survey indicates that most generators illegally dumping wastes are small- to medium-sized companies. Disposal in storm sewers, mixing oil and spraying on country roads, and leaving drums of hazardous waste in fields, the desert or in another company's property were practices defined by generators as "illegal". More than four-fifths of the generators dispose all their wastes off sites and Alabama was the most frequently mentioned out-of-state disposal location. About three-fourths of the generators said RCRA regulations were very difficult to understand. About one-fifth say they treat some substances as hazardous which are not defined by EPA as such. Further, nearly a third think some substances now defined by EPA as hazardous should not be. Finally, EPA has determined that 150 million metric tons of hazardous waste are generated annually in the U.S. compared to a previous estimate of 40 million tons, and most of this waste is handled by two methods—underground injection and surface impoundments.

PCB Disposal
The PCB regulations require that all PCB's in storage on January 1, 1983 be disposed of December 31, 1983. In a policy memorandum EPA explained that if the waste was delivered to the disposal facility by September 30, the disposer is responsible for meeting the year-end dealine. However, this disposal deadline shifts to the generator for PCB's received by the disposal facility after September 30, 1983.

Hazardous Waste Disposal
The commissioners of Adams County, Colorado, have voted unanimously to allow a company to locate a $15 million hazardous waste treatment and disposal facility in the county, 70 miles east of Denver. The company has received a permit to build and operate a 325-acre facility that will have a tank farm to recover recycled liquids and to solidify all other wastes. No liquids are to be placed in the facility's land disposal cells. Look for 1984 amendments to RCRA which will attempt to outlaw land filling of liquid hazardous wastes.

Aluminum Forming Effluent Guidelines
On October 24, 1983 the EPA published finalized Aluminum Forming Effluent Guidelines and Pretreatment Standards. As mentioned in the September Newsletter, facilities affected by these regulations include Atlanta, Gnadenhutten, Louisville Rolling, Meridian, Miami Extruding, and Terre Haute. A review is currently underway at these facilities to estimate the impact of the regulations. Significant changes in the final regulations include a further tightening of allowable pollutant discharge from D.C. Casting, redefinition of "off-kilogram", increased allowable discharge from miscellaneous sources, and an increase in the discharge limitation of cleaning and etching bath under BAT.

Nonpoint Water Pollution Problems
Six of EPA's ten regions believe "nonpoint pollution is the principal cause" of water quality standards violations and control of nonpoint source pollution is needed. The principle sources of nonpoint pollution are agriculture, urban runoff, combined sewer overflows, acid mine drainage, construction sites, oil and gas exploration and production, and ranching. Nonpoint source pollution is a specific problem for the Ohio River near Louisville.

Controlling Hazardous Air Pollutants
Aside from changing the Clean Air Act, EPA is looking for ways to make Section 112 (Hazardous Air Pollutants) more workable. The agency is assessing ways they can step up action to regulate hazardous air pollutants. A staff paper on this issue discusses: (1) changing the current pollutant-by-pollutant approach to decisions over broader classes of source categories; (2) requiring sources emitting toxic substances to apply Reasonably Available Control Technology. However, there is a problem regarding risk management and the listing of a pollutant as hazardous "is timely, awkward, resource intensive and controversal." We are observing EPA actions since Section 112 can apply to ARCO Metals Brass and Fabricated Product plants.

Aluminum Association Acid Rain Study
Proposed acid rain legislation on the aluminum industry could increase energy costs from 2 to 10 mills per kilowatt hour, according to the Association. The analysis was based on 4 and 8 million ton reductions of sulfur dioxide emissions. This information was employed by the aluminum industry executives when they met with EPA Administrator William D. Ruckelshaus on October 7, 1983.

Long Range Acid Rain Transport
As recommended by the National Academy of Sciences, a full scale long range transport study is being conducted jointly by the U.S. and Canada. Tracer releases of gases from Sudbury, Canada and Dayton, Ohio are being tracked by 7 aircraft and 85 ground sampling stations across 1000 km of Eastern North America. It is hoped that the project will help to improve the atmospheric models that are used in designing emission control strategies related to acid rain legislation.

Revised Ambient Air SO_2 Standards
EPA is currently assessing the need to set a new primary one-hour SO_2 ambient air standard. The agency is reviewing the existing 3 and 24 hour standards to determine if they protect against 1 hour peak exposure. A new standard is being considered that would allow up to 5 excursions per year for 1 hour SO_2 as compared to the 1 excursion for the existing 3 and 24 hour standards. ARCO Metals plants located in non-attainment areas for SO_2 are Terre Haute, Louisville, Buffalo and Akron.

EPA Enforcement Activity
Top EPA regional officials have expressed approval for the new enforcement system which places regions in the lead on enforcement. Regional officials are convinced that the plan will lead to improve EPA enforcement efforts. Regional administrators and regional counsels are most happy with their new ability to refer cases for possible judicial action directly to the Justice Department and to U.S. attorneys. Also, as part of the effort to shift the focus of EPA's enforcement effort to compliance monitoring, the EPA will add manpower to the management and compliance evaluation division. The compliance monitoring functions will include: designing, performance standards, accountability measures, enforcement indicators, reporting requirements and other management means, and providing quarterly reports and assessments of performance of agency enforcement components. Look for more inspections of ARCO Metals plants.

Facility Activities

EPA to Inspect Sebree
The Sebree plant received notice from EPA that a "performance audit inspection" will be conducted for their facility. The inspection will cover laboratory procedures, quality assurance, sampling, record keeping, and reporting under the Sebree National Pollutant Discharge Elimination System (NPDES) permit. The inspection was scheduled because Sebree did not respond (due to the strike) to EPA's "voluntary" quality assurance program where known samples are sent to NPDES facilities for analysis. Facilities which complete the analysis, but miss the reference standard by more than 30 percent are also being scheduled for inspections by EPA.

New Florida Water Quality Act
The ARCO Metals' Miami Plants have observed the passage of a strict law to protect water quality, the Water Quality Assurance Act of 1983. A large part of the expenses incurred by the act will be financed by a trust fund. However, the act prohibits hazardous waste landfills, requires construction of a multipurpose hazardous waste facility, and directs the state to set up a monitoring network for groundwater quality.

Waste Water Management at Buffalo
The Buffalo Cast Shop Water discharge is comprised primarily of cooling water blowdown from the mold cooling and casting quench recirculation system. Small amounts of copper and zinc are in solution and suspension in the water as well as residual traces of the borax-type fluxes used on the molds. A recirculation system upgrading project has recently been completed that will allow recirculation of over 95% of Cast Shop water. The pH is maintained at approximately 8.5 and consequently the metals come out of solution and are accumulated in tanks. The system will be carefully monitored in order to generate data for the EPA in its attempt to promulgate a rational regulation for copper foundry water effluents (by E.T. Robinson).

Columbia Falls Air Emissions
As a result of potline 1 startup, the Columbia Falls plant exceeded the Montana fluoride stardards during the months of July and August. Informal discussions have been held with the Montana Air Quality Bureau, who has decided not to issue a notice of violation. Emission results for September and October have been in compliance with the standards.

4th Potline at Sebree Approved
EPA Region 4 has been satisfied that the Sebree plant will not violate PSD air quality increments as a result of a plant expansion to 4 potlines. The EPA had challenged the April 19, 1983 construction permit issued by the State of Kentucky on the grounds that the plant SO_2 impacts on elevated terrain were not adequately addressed by the State of Kentucky. ARCO Metals performed additional dispersion modeling in October to show that the initial modeling assumptions were correct. EPA and Kentucky has approved these revised technical efforts and the subject permit is indeed valid.

Meetings

Aluminum Association Meets with Ruckelshaus
On October 7, the Aluminum Associations Board of Director met with EPA Administrator, William Ruckelshaus. Issues discussed included acid rain, effluent guidelines, and spent potlining. Mr. Ruckelshaus promised high level meetings in an attempt to respond to industry concerns on these issues. Fred Mudge respresented ARCO Metals at the meeting.

Senate Clean Air Act Hearings
The Senate Environmental Committee has specifically set aside time in November for hearings on acid rain, and for hearings on S.768, the air act amendments passed by the committee last Congress and reintroduced early this Congress by committee chairman, Robert Stafford (R-VT).

Errata

In the October Newsletter it was stated that "All PCB articles containing 50 ppm PCB or greater, including transformers containing between 50 and 500 ppm, must be marked with the large PCB label". This statement contains a typographical error and should read "All PCB articles containing 50 ppm PCB or greater, **excluding** transformers containing between 50 and 500 ppm, must be marked with the large PCB label". We apologize for any confusion.

Note to Our Readers

This newsletter is designed to provide environmental information concerning air, waste, water and noise issues, facility and EPA activities, and upcoming meetings. It will be published monthly and mailed to appropriate ARCO Metals personnel. Should you have questions with any article in this Newsletter or desire to author an article, please contact the ARCO Metals Environmental and Regulatory Affairs Staff in Arlington Heights, Illinois 312-577-5508. We welcome your comments and suggestions to improve this Newsletter.